

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ROBERT KOLINEK, Individually And On Behalf  
Of All Others Similarly Situated,

Plaintiff,

vs.

WALGREEN CO., an Illinois Corporation,

Defendant.

Case No. 13-cv-4806

Honorable Matthew F. Kennelly,  
District Judge

Honorable Michael T. Mason,  
Magistrate Judge

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ITS  
RESPONSE TO PLAINTIFF’S CLASS ACTION COMPLAINT**

Defendant Walgreen Co. (“Defendant”), by and through undersigned counsel, hereby moves for an extension of time to respond to Plaintiff Robert Kolinek’s (“Plaintiff’s”) Class Action Complaint (the “Complaint”) to (i) enable Defendant’s counsel to investigate the claims in this purported class action and (ii) accommodate Defendant’s counsel’s commitments in other cases and family summer vacation travel plans. In support of this motion, Defendant states as follows:

1. On July 3, 2013, Plaintiff filed his Complaint. Plaintiff served Defendant that same day, making Defendant’s response due on or before July 24, 2013.
2. On July 17, Defendant retained the undersigned counsel. The following day, Defendant’s counsel contacted Plaintiff’s counsel and requested from Plaintiff’s counsel an extension up to and including September 30, 2013 to respond to the Complaint, subject to approval of the Court. Plaintiff’s counsel agreed.
3. No prior requests for an extension have been made in this case.

4. Allowance of the additional time requested by Defendant will not adversely impact any deadlines or other activity in this matter. This case is at its inception and no proceedings have been scheduled. This request is not made for purposes of delay but rather to allow adequate time to investigate the facts, claims and potential defenses in this potentially complex purported class action; accommodate Defendant's counsel's commitments in other cases (including a number of other class actions); and accommodate counsel's scheduled family vacation (a long-planned family trip for which he will be out of the office for ten days in mid-September). The extension will not prejudice any party as demonstrated by Plaintiff's agreement to the extension.

WHEREFORE, for the foregoing reasons, Defendant Walgreen Co. respectfully requests that this Honorable Court to enter an order granting Defendant until September 30, 2013 to file its response to the Class Action Complaint.

Dated: July 19, 2013

Respectfully submitted,

/s/ Bradley J. Andreozzi

Bradley J. Andreozzi (ARDC No. 6257334)

[bradley.andreozzi@dbi.com](mailto:bradley.andreozzi@dbi.com)

Justin O. Kay (ARDC No.6286557)

[justin.kay@dbi.com](mailto:justin.kay@dbi.com)

**DRINKER BIDDLE & REATH LLP**

191 North Wacker Drive, Suite 3700

Chicago, IL 60606-1698

Tel: (312) 569-1000

Fax: (312) 569-3000

*Counsel for Defendant Walgreen Co.*